

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Bankruptcy Court
Southern District of Texas
FILED
FEB 05 2018
David J. Bradley, Clerk of Court

In re: * Chapter 11
LOCKWOOD HOLDINGS, INC., *et al.*, * Case No. 18-30197 (DRJ)
Debtors. *
* * * * * Jointly Administered
* * * * *

NOTICE OF RECLAMATION DEMAND
OF KEDDCO MFG. INC.

TO THE DEBTORS AND ALL INTERESTED PARTIES:


PLEASE TAKE NOTICE that Kedddco Mfg. Inc. (“**Kedddco**”), by and through its undersigned counsel, hereby submits this notice of delivery of a written demand, pursuant to §§ 503 and 546 of 11 U.S.C. §§ 101 et seq. (the “**Bankruptcy Code**”), and § 2-702 of the Uniform Commercial Code, on the above-captioned debtors and debtors-in-possession (the “**Debtors**”) to reclaim certain assets (the “**Goods**”) that are subject to reclamation. The Goods were sold in the ordinary course of Kedddco’s business and delivered on credit terms to, and received by, the Debtors during the 45 days prior to the filing of the Debtors’ bankruptcy petitions. Kedddco understands that the Debtors were insolvent at the time it received delivery of the Goods. Kedddco attaches as **Exhibit A** and incorporates by reference herein, a copy of its formal reclamation demand letter it served on the Debtors on January 26, 2018, together with the related invoices identifying the Goods subject to reclamation. In exercising its reclamation rights, Kedddco does not waive, and hereby expressly reserves, any and all of its rights or remedies or claims it may have under any and all applicable laws and in equity. Further, Kedddco expressly reserves and preserves its right to assert an administrative expense pursuant to section 503(b)(9) of

Bankruptcy Code, for all goods delivered by Kedddco to the Debtors within the 20 days immediately preceding the commencement of the Debtor's chapter 11 case.

Respectfully submitted:

Date: 2/1/2018

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